



U.S. Department of Justice
United States Attorney's Office
Eastern District of Virginia

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April 27, 2017

The Honorable Arenda W. Allen
Walter E. Hoffman United States Courthouse
600 Granby Street
Norfolk, VA 23510

Re: *United States v. Lionel Williams*, 2:17-cr-1

Dear Judge Allen:

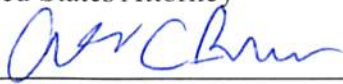
Since the government's last letter to the Court regarding the proposed schedule under the Classified Information Procedures Act (CIPA), Title 18, United States Code, App. III, the parties have conferred regarding scheduling and discovery in this matter. The government has identified additional evidence that it may be necessary to produce to the defense. Given the requirements of CIPA, the government estimates that doing so will require modification of the original schedule to the one listed below. The government has proposed the following schedule to defense counsel, and defense counsel have agreed to this modified schedule. Accordingly, the government proposes the following modified schedule to this Court:

- June 15, 2017: Deadline for United States to file a CIPA § 4 filing and § 3 protective order.
- July 14, 2017: Deadline for defense counsel to file a CIPA § 5 pleading.
- If a CIPA § 6 response or CIPA § 6 hearing is needed, they will be scheduled after the CIPA § 5 pleading is submitted.

Defense counsel are in the final stages of receiving their security clearances. After they are cleared, the government will conduct a reverse proffer to acclimate the defense to certain relevant evidence in the case, after which the government intends to make an initial plea offer to the defendant. Should that offer be rejected, the government will begin providing discovery to the defense, and that process will continue through the CIPA procedures outlined above.

Sincerely,

Dana J. Boente
United States Attorney

By: 

Joseph DePadilla
Andrew Bosse
Assistant United States Attorney

cc: Keith L. Kimball, Esq.
